



RICHARD CORDRAY  
OHIO ATTORNEY GENERAL

September 28, 2010

Received & Inspected

SEP 30 2010

FCC Mail Room

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A306  
Washington, DC 20554

Re: Certification of Support for Rural and Non-Rural High-Cost Carriers Pursuant to  
47 C.F.R. Sections 54.313-314, CC Docket Nos., CC Docket No. 96-45.

Dear Ms. Dortch:

I represent the Public Utilities Commission of Ohio ("Ohio Commission") in this proceeding and I am writing to you in that capacity. Accompanying this letter is a copy of a Finding & Order released by the Ohio Commission on September 22, 2010. By this Finding & Order, the Ohio Commission hereby certifies that all federal high cost support provided to rural and non-rural carriers in this state will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with section 254 (e) of the Communications Act of 1934, as amended. This includes High Cost Loop (HCL) support, Local Switching Support (LSS), High Cost Model (HCM) support, and high cost support received pursuant to the purchase of exchanges.

As you can see from the attached Order (Attachment 1), the Ohio rural carriers previously identified by the Universal Service Administrative Company (USAC) as eligible to receive federal USF support have filed sworn affidavits with the Ohio Commission demonstrating their intent to use funding in a manner consistent with Section § 254(e) of the Communications Act of 1934, as amended.

Attached are lists of rural and non-rural carriers certified by the Ohio PUC pursuant to sections 54.313 and 54.314 of the FCC's rules (47 C.F.R. § § 54.313, 54.314), which requires states to establish an annual certification process for rural and non-rural carriers receiving federal high cost support. As requested by the Universal Service

Administrative Company, listed beside each carrier is its unique assigned 6-digit NECA study area code (SAC), if known.

Accordingly, the Ohio Commission certifies that all of the above-referenced carriers have indicated in writing their intent to use the funding only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with § 254(e) of the Communications Act of 1934, as amended.

**Please send me a time-stamped copy of this letter in the enclosed self-addressed envelope (an extra copy of this letter is enclosed for that purpose).** Otherwise, if you should have any questions or comments regarding this submittal, please contact me at the number below or Jennifer Reed, Utilities Specialist 1 with the PUCO, at (614) 644-8000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Margard III', written in a cursive style.

**Werner L. Margard III**  
Public Utilities Section  
180 E. Broad Street, 6<sup>th</sup> Floor  
Columbus, OH 43215  
(614) 466-4396  
Fax: (614) 644-8764

cc: Karen Majcher, USAC

## BEFORE

## THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Annual Filing	)	
Requirements Pertaining to the	)	Case No. 10-632-TP-UNC
Provisioning of High Cost Universal	)	
Service.	)	

FINDING AND ORDER

The Commission finds:

- (1) On May 7, 1997, the Federal Communications Commission (FCC) issued a Report and Order in CC Docket 96-45 (96-45) (*In the Matter of Federal-State Board on Universal Service*) adopting rules to promote universal service consistent with the requirements of the Telecommunications Act of 1996 (1996 Act). In its 96-45 decision, the FCC, among other things, set forth parameters for the states to determine those carriers eligible to receive federal universal service support. The states were further to determine those carriers that should be classified as rural carriers or non-rural carriers for the purpose of federal universal service support consistent with the Communications Act of 1934, as amended.
  
- (2) On May 23, 2001, the FCC released its Fourteenth Report and Order and Twenty-Second Order on Reconsideration in CC Docket No. 96-45, and determined that states should be responsible for deciding whether rural carriers are using their universal service high cost support, specifically, high cost loop support [47 C.F.R., Part 36], local switching support [47 C.F.R. §54.301], and any high cost support received as a result of a purchase of exchanges [47 C.F.R. §54.305] consistent with Section 254(e) of the 1996 Act. Under Section 254(e), carriers must use universal service support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." Accordingly, the FCC stated that it would require the states that wish to receive federal universal service high cost funding support for rural carriers within their boundaries to file a certification with the FCC and the Universal Service Administrative Company (USAC) stating that all federal high-cost funds flowing to those carriers in that state will be used in a manner consistent with Section 254(e) of the 1996 Act.

Absent such certification, carriers will not receive such support. Moreover, in the event that a state determines that a carrier has not complied with Section 254(e) of the 1996 Act, the state shall have the authority to revoke a carrier's certification.

- (3) FCC certifications for federal high cost funding are to be submitted annually on October 1, in order to be eligible for high cost support throughout the next full calendar year. This Finding and Order represents the tenth annual proceeding conducted by the Commission pursuant to these federal directives.
- (4) In order to comply with the FCC's certification requirements, on August 4, 2010, the Commission released an Entry in the instant docket calling for notarized affidavits from those rural carriers receiving federal universal service high cost funding in Ohio, attesting that they will utilize such support consistent with Section 254(e) of the 1996 Act. All affected carriers were required to use a template affidavit form provided by the Commission (as Attachment A in the August 4, 2010 Entry), and were directed to file such affidavits by August 31, 2010. Accordingly, properly filed affidavits were received from the following carriers:

Arcadia Telephone Company d/b/a TDS Telecom  
The Arthur Mutual Telephone Company  
Ayersville Telephone Company  
Bascom Mutual Telephone Company  
Benton Ridge Telephone Company  
Buckland Telephone Company  
Century Tel of Ohio, Inc.  
The Champaign Telephone Company  
The Chillicothe Telephone Company  
The Columbus Grove Telephone Company  
The Conneaut Telephone Company  
Continental Telephone Company d/b/a TDS Telecom  
Doylestown Telephone Company  
Farmers Mutual Telephone Company  
Fort Jennings Telephone Company

Frontier Telecommunications of Michigan  
Germantown Independent Telephone Company  
Glandorf Telephone Company, Inc.  
Kalida Telephone Company, Inc.  
Little Miami Telephone Corporation d/b/a TDS  
Telecom  
McClure Telephone Company  
Middle Point Home Telephone Company  
Minford Telephone Company  
New Knoxville Telephone Company  
Nova Telephone Company  
Oakwood Telephone Company d/b/a TDS Telecom  
Orwell Telephone Company  
The Ottoville Mutual Telephone Company  
Pattersonville Telephone Company  
Ridgeville Telephone Company  
Sherwood Mutual Telephone Association, Inc.  
Sycamore Telephone Company  
Telephone Service Company  
Vanlue Telephone Company d/b/a TDS Telecom  
Vaughnsville Telephone Company  
Wabash Telephone Company

- (5) The Commission's Staff has reviewed the affidavits submitted by the aforementioned companies, and has concluded that they satisfy the FCC's requirements for certification to receive high cost funding consistent with Section 254(e) of the 1996 Act.
- (6) The Commission finds that certification of the aforementioned carriers to receive federal high cost support, as well as high cost loop support [47 C.F.R., Part 36], local switching support [47 C.F.R. §54.301], and any high cost support received as a result of a purchase of exchanges [47 C.F.R. §54.305] for rural carriers, should be granted.

It is, therefore,

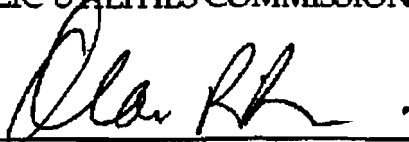
ORDERED, That all carriers identified in Finding (4) above are hereby certified to the FCC and USAC as being eligible to receive federal high cost support,

as well as high cost loop support [47 C.F.R., Part 36], local switching support [47 C.F.R. §54.301], and any high cost support received as a result of a purchase of exchanges [47 C.F.R. §54.305] for rural carriers, as such carriers have demonstrated their intent to utilize such funding in a manner consistent with Section 254(e) of the 1996 Act. It is, further,

ORDERED, That nothing contained in this Finding and Order shall be deemed binding upon this Commission in any subsequent investigation or proceeding involving the justness or reasonableness of any rate, charge, rule, or regulation. It is, further,

ORDERED, That a copy of this Finding and Order be served upon the Ohio Telecom Association and Telephone Service Company.


THE PUBLIC UTILITIES COMMISSION OF OHIO



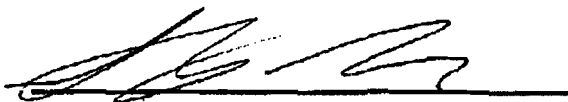
Alan R. Schriber, Chairman



Paul A. Centolella



Valerie A. Lemmie



Steven D. Lesser

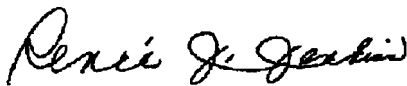


Cheryl L. Roberto

JR:dmm

Entered in the Journal

SEP 22 2010



Renee J. Jenkins  
Secretary

Presented below is a list of those Ohio rural carriers that have satisfied the PUCO's affidavit requirement, and thus obtained certification to receive federal high cost support, including high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support .

**Carriers Having Properly Filed 254(e) Rural Affidavits**

<b>Study Area Name</b>	<b>SAC</b>
ARCADIA TELEPHONE COMPANY d/b/a TDS TELECOM	300585
ARTHUR MUTUAL TELEPHONE COMPANY , THE	300586
AYERSVILLE TELEPHONE COMPANY	300588
BASCOM MUTUAL TELEPHONE COMPANY	300589
BENTON RIDGE TELEPHONE COMPANY	300590
BUCKLAND TELEPHONE COMPANY	300591
CENTURYTEL OF OHIO, INC.	300630
CHAMPAIGN TELEPHONE COMPANY , THE	300594
CHILLICOTHE TELEPHONE COMPANY , THE	300597
COLUMBUS GROVE TELEPHONE COMPANY	300604
CONNEAUT TELEPHONE COMPANY	300606
CONTINENTAL TELEPHONE COMPANY d/b/a TDS TELECOM	300607
DOYLESTOWN TELEPHONE COMPANY	300609
FARMERS MUTUAL TELEPHONE COMPANY	300612
FORT JENNINGS TELEPHONE COMPANY	300614
FRONTIER COMMUNICATIONS OF MICHIGAN	300682
GERMANTOWN INDEPENDENT TELEPHONE COMPANY	300618
GLANDORF TELEPHONE COMPANY, INC.	300619
KALIDA TELEPHONE COMPANY, INC.	300625
LITTLE MIAMI COMMUNICATIONS CORPORATION d/b/a TDS TELECOM	300613
MCCLURE TELEPHONE COMPANY	300598
MIDDLE POINT HOME TELEPHONE COMPANY	300633
MINFORD TELEPHONE COMPANY	300634
NEW KNOXVILLE TELEPHONE COMPANY , THE	300639
NOVA TELEPHONE COMPANY, THE	300644
OAKWOOD TELEPHONE COMPANY d/b/a TDS TELECOM	300645
ORWELL TELEPHONE COMPANY	300649
OTTOVILLE MUTUAL TELEPHONE COMPANY, THE	300650
PATTERSONVILLE TELEPHONE COMPANY	300651
RIDGEVILLE TELEPHONE COMPANY	300654
SHERWOOD MUTUAL TELEPHONE ASSOCIATION, INC.	300656
SYCAMORE TELEPHONE COMPANY	300658
TELEPHONE SERVICE COMPANY	300659
VANLUE TELEPHONE COMPANY d/b/a TDS TELECOM	300662
VAUGHNSVILLE TELEPHONE COMPANY	300663
WABASH MUTUAL TELEPHONE COMPANY	300664